



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

*R. Salkie*

**DATE:** MAR 31 1995

**SUBJECT:** Confirmation of Verbal Authority to Conduct a CERCLA Removal Action at the St. Paul Ave. Trailer Site, Jersey City, Essex County, New Jersey -

**ACTION MEMORANDUM**

**FROM:** *Dwayne M. Harrington*  
Dwayne M. Harrington, On-Scene Coordinator  
Response and Prevention Branch

**TO:** Kathleen C. Callahan, Director  
Emergency and Remedial Response Division

**THRU:** *Richard C. Salkie*  
Richard C. Salkie, Associate Director for  
Removal and Emergency Preparedness Programs

**Site ID No.:** FE

**I. PURPOSE**

The purpose of this Action Memorandum is to document verbal approval of funding for the Removal Action initiated at the St. Paul Ave. Trailer Site, Jersey City, Essex County, New Jersey. Verbal Authorization was received from George Pavlou, Acting Director, Emergency and Remedial Response Division, on February 8, 1995, for a total project ceiling of \$150,000, with a mitigation ceiling of \$100,000.

On February 8, 1995, the U.S. Environmental Protection Agency (EPA) received a verbal request from the New Jersey Department of Environmental Protection (NJDEP) to perform a removal action on the St. Paul Ave. Trailer site in Jersey City, NJ, under the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended by 42 U.S.C. §9601 et. seq. The site consists of an intermodal container trailer of hazardous wastes abandoned in Jersey City. This Action Memorandum recommends that a removal action be conducted to dispose of all hazardous substances on the site.

This site is not on the National Priorities List (NPL), and there are no nationally significant or precedent setting issues associated with this site.

## II. SITE CONDITIONS AND BACKGROUND

### A. Site Description

#### 1. Removal Site Evaluation

A preliminary assessment of the site performed by EPA on February 8, 1995, determined that the trailer contains approximately 85 drums of hazardous wastes. Drum labels and material safety data sheets obtained for the materials identified the contents of the drums to be primarily chlorinated and non-chlorinated organic solvents, liquid ammonia, and corrosive solids. Four drums are labeled "PCB Wastes".

#### 2. Physical Location

The trailer was abandoned on St. Paul Ave., Jersey City, NJ, in a light industrial area. The trailer was relocated (under the direction of the NJDEP) to the Jersey City Incinerator Authority. The trailer is currently staged in the rear parking area of the facility.

#### 3. Site Characteristics

The intermodal container trailer was allegedly stolen at an undetermined date from a local retail distributor in Jersey City. The trailer was discovered abandoned by the Jersey City Police Department on February 7, 1995, and was relocated to a more secure location at the Jersey City Incinerator Authority. The Jersey City Incinerator Authority is in a light industrial/commercial area of Jersey City.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

The following compounds have been tentatively identified at the site:

<u>Compound</u>	<u>Statutory Source for Designation as a Hazardous Substance</u>
Ammonia	RCRA § 3001
Ethylene glycol	CWA § 311(b)(4); CWA § 307(a); RCRA § 3001
Methanol	CWA § 311(b)(4); CWA § 307(a); RCRA § 3001
Methylene chloride	CWA § 311(b)(4); CWA § 307(a); RCRA § 3001
Polychlorinated biphenyls (PCB)	CWA § 311(b)(4); CWA § 307(a); RCRA § 3001
Vinyl acetate	CWA § 311(b)(4); CWA § 307(a); RCRA § 3001

These hazardous substances are acutely and chronically toxic, corrosive, and/or flammable.

The potential health effects from these compounds are identified below:

POTENTIAL HEALTH AND TOXICOLOGICAL EFFECTS

	Liver Damage	Kidney Damage	Respiratory Damage	Central Nervous System	Dermal Effects	Cardiovascular	Carcinogen
Ammonia			X				
Ethylene glycol				X	X	X	
Methanol	X	X		X	X		
Methylene chloride				X	X	X	
PCB	X				X		X
Vinyl acetate	X			X			

5. NPL Status

The site is not on the NPL, and there are no efforts underway to list this site.

B. Other Actions to Date

1. Previous Actions

The trailer was discovered abandoned by the Jersey City Police on February 7, 1995, and was moved to the Jersey City Incinerator Authority under direction of the NJDEP. There have been no other actions concerning the trailer prior to that date.

2. Current Actions

EPA initiated a CERCLA Removal Action at the site on February 13, 1995. To date all of the drums have been removed from the trailer and are temporarily stored in a garage at the Jersey City Incinerator Authority. All unopened drums have been sampled and are being analyzed for waste characteristics.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

The trailer was discovered abandoned by the Jersey City Police Department on February 7, 1995, and was relocated under the direction of the NJDEP to the Jersey City Incinerator Authority.

2. Potential for Continued State/Local Response

Neither NJDEP or local government have the resources available to perform the necessary removal action at the site. These organizations will act in a supporting role throughout the removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Hazardous substances, pollutants or contaminants presently stored at the site represent a threat to the public health and welfare as defined by Section 300.415(b)(2) of the National Contingency Plan (NCP), in that there is an actual on-going release and/or there is a high potential for such to occur. Many of the materials on the site are toxic and/or corrosive, and as such present a risk of direct human contact. Many of the materials are incompatible if mixed and present the threat of runaway chemical reaction. The site is located in a densely populated commercial area.

Many of the drums are in a deteriorated condition. The Incinerator Authority has expressed concern to EPA about the condition and location of the drums, and the inability of the incinerator personnel to mitigate any emergencies involving the drums. Should the drums rupture or leak, the vapors produced would present a substantial threat to incinerator authority employees.

Should a fire occur in the drum storage area, toxic fumes created by the combustion of these materials would severely impact the incinerator authority employees, necessitating the evacuation of incinerator personnel and possibly surrounding businesses. In the event of a fire, it is anticipated that fire fighters would not be able to avoid contamination from fumes during firefighting efforts.

B. Threats to the Environment

Spills or runoff from the facility in the event of a fire would wash contaminants into storm sewers located in the roadways adjacent to the facility. These storm sewers ultimately flow into Newark Bay.

The materials stored on-site pose a threat of an air release caused by the reaction of incompatible materials, as well as the potential to contaminate nearby soils and surface water via spills or firefighting runoff in the event of a fire.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by completing the response action recommended in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of the removal action is to eliminate the threat of exposure through direct human contact caused by a release of the hazardous materials at the site. To date, EPA has mobilized the Emergency Response Cleanup Services Contractor (ERCS) to the site and has completed the following:

- i. Stabilization and securing of drums and other containers of hazardous materials;
- ii. Sampling of opened containers.

The proposed continued removal action will include:

- iii. Characterization and analysis of materials for proper disposal;
- vi. Transportation and disposal of all hazardous wastes in accordance with EPA's CERCLA Off-Site Disposal Policy.

The selected mode of transportation and method of disposal will be based on the analytical data.

2. Contribution to Remedial Performance

This removal action will completely remediate this site, and as such, no long-term remedial measures will be necessary.

3. Description of Alternative Technologies

Alternative technologies will be evaluated to determine if they are cost effective and efficient.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs within the scope of the project, including RCRA, CERCLA, and Department of Transportation (DOT) regulations, that pertain to the disposal of these hazardous substances, will be met to the extent practicable.

5. Project Schedule

The removal action can be initiated within one week of approval for funding. Sampling, analysis, overpacking, materials transferring, segregating, staging, transport, and disposal will occur thereafter.

B. Estimated Costs

1. Extramural Costs:

Regional Allowance Costs: \$ 100,000  
(Total clean-up contractor costs include labor, equipment, materials, and laboratory disposal analysis)

2. Other Extramural Costs not Funded From the Regional Allowance:

Total; TAT, including multiplier costs \$ 20,000  
Subtotal, extramural costs \$ 120,000  
Extramural Costs Contingency \$ 24,000  
(20% of subtotal, extramural Costs)  
TOTAL, EXTRAMURAL COSTS \$ 144,000  
(rounded to nearest \$1,000)

Intramural Costs:

Intramural Direct Costs \$ 1,500  
Intramural Indirect Costs \$ 4,500  
TOTAL, INTRAMURAL COSTS \$ 6,000  
TOTAL, REMOVAL PROJECT CEILING \$ 150,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action or no action could result in the release of hazardous substances into the environment, thereby exposing the incinerator authority employees and employees of surrounding businesses to hazardous substances.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

The EPA Criminal Investigation Division and New Jersey Department of Criminal Justice is investigating the abandonment of the trailer.



Efforts will be made to identify viable Potential Responsible Parties (PRPs) to assume responsibility for the cost of the clean-up. The On-Scene Coordinator will work with the Program Support Branch, the Office of Regional Counsel, and the State of New Jersey and attempt to locate viable PRPs.

**IX. RECOMMENDATION**

This decision document represents a selected Removal Action for the St. Paul Ave. Trailer Site, Jersey City, Essex County, New Jersey. This document was developed in accordance with CERCLA and not inconsistent with the National Contingency Plan NCP.

Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a removal action. This Action Memorandum will confirm verbal authority of George Pavlou, Acting Director, Emergency and Remedial Response Division, on March 8, 1995, authorizing a total project ceiling of \$150,000, of which \$100,000 will be for mitigation contracting.

Please indicate your approval and authorization of funding, as per the current delegation of authority, by signing below.

Approved: \_\_\_\_\_

*Kathleen C. Callahan*  
Kathleen C. Callahan, Director  
Emergency and Remedial Response Division

Date: 3/31/95

Disapproved: \_\_\_\_\_

Kathleen C. Callahan, Director  
Emergency and Remedial Response Division

Date: \_\_\_\_\_

cc: (after approval is obtained)

W. Muszynski, DRA  
K. Callahan, ERRD  
R. Salkie, 2ERR-ADREPP  
B. Sprague, 2ERR-RPB  
J. Daloia, 2ERR-RPB  
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